

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Sari K. Silwani, Et al

Plaintiff,

CASE NO: 2:19-cv-3356

The Honorable Robin

Reames, Et al

Defendant.

Judge: Algenon L. Marbley

Chief Magistrate Judge:

Elizabeth P. Deavers

Motion for Attorney Withdrawal

Now comes the undersigned attorney and respectfully requests to withdraw from this case consistent with local rules and Ohio Rules of Professional Conduct 1.16:

(1) withdrawal can be accomplished without material adverse effect on the interests of the client;

The parties have been in extensive negotiations for months attempting to settle the case. If it has not settled, he is not prejudiced in finding another attorney to represent him from here forward as litigation has been on hold during the settlement process. If the Defendants are successful in their motion to enforce a settlement agreement the case is done anyway, and we believe, based on his limited email communication, that he is actively looking for another counsel to take over anyway.

(4) the client insists upon taking action that the lawyer considers repugnant or with which the lawyer has a fundamental disagreement;

The undersigned counsel has attempted to explain the legal pros and cons and the legal options with probable outcomes of Plaintiff's current course of action. Plaintiff has not been willing to take the attorney's phone calls or advice and instead he has responded with texts and emails that

are insulting, dismissive, and with false accusations. He has been given multiple warnings to apologize and retract these false accusations or the undersigned counsel would withdraw from the case, and Plaintiff has not done so. In addition, we have a fundamental disagreement on various positions that he is taking in this case at this point.

(5) the client fails substantially to fulfill an obligation, financial or otherwise, to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;

(6) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client;

The undersigned attorney has repeatedly warned in several emails to Plaintiff that he would withdraw from the case unless he gets an additional deposit for proceeding with defending a motion to enforce settlement and litigate the case without a response.

Plaintiff has been advised that he will need to either retain new counsel or defend any motion to enforce the settlement agreement himself.

Respectfully Submitted,

/s/Omar Tarazi
OMAR TARAIZI (0084165)
Attorney for Plaintiff
5635 Sandbrook Lane
Hilliard, OH 43026
614/226-2823
614/319/4242 (Fax)
otarazi@tarazilaw.com

Certificate of Service

I certify that the forgoing was served on the Defendant's Counsel via e-mail: lynn timer@dinkler-law and carin@dinkler-law.com and on Plaintiff at silwaniproperties@yahoo.com on this 4/9/2021.

/s/Omar Tarazi